

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

Plaintiff, :

- v. - :

ALL FUNDS HELD IN ACCOUNT NUMBER :
CH1408760000050335300 AT LOMBARD ODIER :
Darier Hentsch & CIE BANK, SWITZERLAND, :
ON BEHALF OF TAKILANT LIMITED, AND :
ANY PROPERTY TRACEABLE THERETO, :

Civil Action No. 16-CV-01257

ALL FUNDS UP TO AN AMOUNT TOTALING
\$198,919,748.00 HELD IN ACCOUNT NUMBER
CH3408760000050982900 AT LOMBARD ODIER
Darier Hentsch & CIE BANK, SWITZERLAND,
ON BEHALF OF TOZIAN LIMITED, AND ANY
PROPERTY TRACEABLE THERETO, and

ALL FUNDS UP TO AN AMOUNT TOTALING
\$3,500,000.00 HELD IN ACCOUNT NUMBER
CH2308657007007159821 AT UNION BANCAIRE
PRIVEE, SWITZERLAND, ON BEHALF OF
TOZIAN LIMITED, AND ANY PROPERTY
TRACEABLE THERETO.

Defendants *in rem*.

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DECLARATION OF PUBLICATION

I, HEATHER MCQUEEN, pursuant to Title 28, United States Code, Section 1746, hereby
declare under penalty of perjury:

That I am a Paralegal in the office of the United States Department of Justice, Asset
Forfeiture and Money Laundering Section;

That attached to this declaration are (1) a true and correct copy of the Notice of Civil Forfeiture in this action, and (2) a true and correct copy of an Advertisement Certification Report, indicating that the aforementioned notice was posted on an official government internet site (www.forfeiture.gov) for at least thirty (30) consecutive days, beginning on February 19, 2016, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions; and

That both of the documents were obtained from a Consolidated Asset Tracking System maintained by the Department of Justice.

Dated: Washington, D.C.
April 20, 2016

/s/ Heather McQueen
HEATHER MCQUEEN
Paralegal/Legal Assistant III

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
COURT CASE NUMBER: 1:16-CV-01257; NOTICE OF FORFEITURE ACTION**

Pursuant to 18 U.S.C. § 981, the United States filed a verified Complaint for Forfeiture against the following property:

All funds held in account number CH1408760000050335300 at Lombard Odier Darier Hentsch & Cie Bank, Switzerland, on behalf of Takilant Limited, and any property traceable thereto (16-IRS-000126)

All Funds up to an amount totaling \$198,919,748.00 held in account number CH3408760000050982900 at Lombard Odier Darier Hentsch & Cie Bank, Switzerland, on behalf of Tozian Limited, and any property traceable thereto (16-IRS-000127)

All Funds up to an amount totaling \$3,500,000.00 held in account number CH2308657007007159821 at Union Bancaire Privee, Switzerland, on behalf of Tozian Limited, and any property traceable thereto (16-IRS-000128)

Any person claiming a legal interest in the Defendant Property must file a verified Claim with the court within 60 days from the first day of publication (February 19, 2016) of this Notice on this official government internet web site and an Answer to the complaint or motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days thereafter. 18 U.S.C. § 983(h)(1) permits a court to impose a civil fine on anyone asserting an interest in property which the court determines was frivolous.

The verified Claim and Answer must be filed with the Clerk of the Court, United States District Court, 500 Pearl Street, Room 120, New York, NY 10007, and copies of each served upon Trial Attorney Marie Dalton, 1400 New York Avenue, NW, Suite 10100, Washington, DC 20530, or default and forfeiture will be ordered. See, 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.



Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between February 19, 2016 and March 19, 2016. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. All funds held in accounts

Court Case No: 1:16-CV-01257
For Asset ID(s): See Attached Advertisement Copy

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	02/19/2016	24.0	Verified
2	02/20/2016	24.0	Verified
3	02/21/2016	24.0	Verified
4	02/22/2016	24.0	Verified
5	02/23/2016	23.9	Verified
6	02/24/2016	24.0	Verified
7	02/25/2016	24.0	Verified
8	02/26/2016	24.0	Verified
9	02/27/2016	24.0	Verified
10	02/28/2016	24.0	Verified
11	02/29/2016	23.8	Verified
12	03/01/2016	24.0	Verified
13	03/02/2016	24.0	Verified
14	03/03/2016	24.0	Verified
15	03/04/2016	24.0	Verified
16	03/05/2016	24.0	Verified
17	03/06/2016	24.0	Verified
18	03/07/2016	24.0	Verified
19	03/08/2016	24.0	Verified
20	03/09/2016	24.0	Verified
21	03/10/2016	24.0	Verified
22	03/11/2016	24.0	Verified
23	03/12/2016	24.0	Verified
24	03/13/2016	23.0	Verified
25	03/14/2016	24.0	Verified
26	03/15/2016	24.0	Verified
27	03/16/2016	24.0	Verified
28	03/17/2016	24.0	Verified
29	03/18/2016	24.0	Verified
30	03/19/2016	24.0	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.